IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

JANICE A. WEISEL :

:

Plaintiff

v. : Civil Action No. 1:19-cv-03281

:

KAIMETRIX, LLC

:

Defendants

JOINT STATUS REPORT

COME NOW, Plaintiff, Janice Weisel, by and through her attorneys, Paul V. Bennett, Jeffrey J. Sadri, and Bennett & Ellison, P.C., and Defendant, Kaimetrix, LLC, by and through its attorneys, James S. Liskow and DeCaro, Doran, Siciliano, Gallagher & DeBlasis, LLP, and in response to the Court's May 7, 2020, Letter Order submit the following Joint Status Report:

(1) Whether there is unanimous consent to referral of all proceedings in this case, including trial and final disposition, to a Magistrate Judge.

The parties do not consent.

(2) whether there should be any changes to the dates in the draft scheduling order;
Given the present COVID-19 crisis, the parties ask that the deadlines in the Scheduling

Order be extended three months.

(3) whether discovery of electronically stored information may be necessary;

The parties anticipate that there may be production of electronically stored information but do not believe that such discovery will require procedures outside normal manner of conducting discovery.

(4) whether you would like to defer any of the expert discovery until after summary judgment motions are resolved;

The parties would not like to defer any expert discovery.

(5) the number of deposition hours needed, if any; and

The parties anticipate twenty-four hours of deposition time from both sides.

(6) whether it would be appropriate to conduct a settlement conference with a Magistrate Judge either before or after discovery.

The parties do not believe it would be appropriate for a settlement conference to occur at this time. The parties will advise the Court if a settlement conference would be appropriate after discovery is concluded.

Respectfully submitted,

DeCARO, DORAN, SICILIANO, GALLAGHER & DeBLASIS, LLP

/s/ James S. Liskow

James S. Liskow 17251 Melford Boulevard Suite 200 Bowie, MD 20715

Tel: (301) 352-4950 Fax: (301) 352-8691

jliskow@decarodoran.com

/s/ Paul V. Bennett

Paul V. Bennett, Esquire

/s/ Jeffrey J. Sadri

Jeffrey J. Sadri, Esquire BENNETT & ELLISON, P.C. 2086 Generals Highway, Ste. 201 Annapolis, Maryland 21401

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 17	7th day of <u>June</u> , 2020, a copy of the
foregoing Joint Status Report was e-filed to:	
Paul V. Bennett, Esquire Jeffrey J. Sadri, Esquire BENNETT & ELLISON, P.C. 2086 Generals Highway, Ste. 201 Annapolis, Maryland 21401	
	James S. Liskow

 $I: \\ Common \\ WP \\ L4 \\ JSL \\ 2-CLIENT\ FILES \\ We is el\ v.\ Kaimetrix \\ Pleadings \\ Joint\ Status\ Report. docx$